

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

UNITED STATES OF AMERICA

v.

**RALPH GREGORY SAINT-JOIE
AKA: RALPH GREGORY SAINT JOIE**

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CRIMINAL NO. 5:21-CR-1234-2

STIPULATION OF FACT

The United States of America, by and through Jennifer B. Lowery, Acting United States Attorney for the Southern District of Texas and Brian Bajew, Assistant United States Attorney, and the defendant, **RALPH GREGORY SAINT-JOIE AKA: RALPH GREGORY SAINT JOIE** and the defendant's counsel, hereby stipulate as follows:

I.

If this case proceeded to trial, the United States of America would prove each element of the offense beyond a reasonable doubt. The following facts, among others, would be offered to establish the Defendant's guilt:

II.

On June 13, 2021, at approximately 12:45 a.m., Defendant Emmanuel Oppongagyare approached the Hebbronville Border Patrol Checkpoint located on Farm to Market (FM) Road 1017 driving a four-door sedan with Co-Defendant Ralph Gregory **Saint-Joie** in the front passenger seat. After making contact with the vehicle, the Border Patrol Agent observed that both occupants were wearing their Army-issued uniforms. When asked about his intended destination, Oppongagyare stated he was traveling from Zapata, Texas to San Antonio, Texas. The Border Patrol Agent then asked why Oppongagyare was taking such an indirect route of travel, to which he told the Agent his GPS told him to go that way.

During the primary inspection, a canine unit positively alerted to the presence of concealed humans and/or narcotics in the trunk of the vehicle. Oppongagyare was then asked to open the trunk, at which time two individuals were discovered hiding. An immigration inspection determined both to be undocumented aliens (UDA).

Francisco Sanchez-Hernandez was detained as a material witness and stated his family made arrangements for him to be smuggled into the United States and onto Houston, Texas for an unknown amount. Sanchez-Hernandez crossed the Rio Grande from Reynosa, Mexico with the female UDA also found in the trunk, and they were then picked up and taken to a stash house. After a period of time, they were picked up in a car and taken to a location, at which point the driver stopped on the side of the road. Sanchez-Hernandez and the female were then placed into the trunk of a different vehicle. When presented with separate photographic arrays, Sanchez-Hernandez identified Oppongagyare as the driver of the vehicle and **Saint-Joie** as the passenger.

Diana Lizeth Andres-Ochoa was detained as a material witness and stated she crossed into the United States via the Rio Grande from Reynosa, Mexico on June 4, 2021 and was kept in a stash house for eight days. Andres-Ochoa was asked to pay \$100 in advance before leaving the stash house and was placed in the trunk of a car and driven for about three hours. After about three hours of driving, she was told to switch vehicles and got into the trunk of a different car. Andres-Ochoa was told she was being driven to Houston, Texas, and was asked to stay quiet. When presented with separate photographic arrays, Sanchez-Hernandez identified Oppongagyare as the driver of the vehicle and **Saint-Joie** as the passenger.

After rights advisement and waiver, Oppongagyare stated he was recruited by someone he met through **Saint-Joie** to pick people up from McAllen and drive them to San Antonio. Oppongagyare indicated he was given \$100 for gas but was told he would be paid more upon

arrival in San Antonio. According to Oppongagyare, the person who recruited him told him and **Saint-Joie** to wear their Army-issued uniforms to avoid questioning at the checkpoints when traveling. The recruiter told Oppongagyare the same tactic has worked in previous smuggling events.

On June 12, 2021, Oppongagyare and **Saint-Joie** drove from Killeen, Texas to McAllen. Once in McAllen, Oppongagyare and **Saint-Joie** were given a new address of where to pick the people up, which they then drove to and saw a Dodge Durango on the side of the highway with its hazard lights on. Oppongagyare parked nearby, and the driver of the Durango approached his vehicle with two other people and knocked on the window. According to Oppongagyare, **Saint-Joie** then spoke to the driver in Spanish and instructed the two people with the driver—a male and a female—to get into the trunk.

III.

Defendant, **RALPH GREGORY SAINT-JOIE AKA: RALPH GREGORY SAINT JOIE**, hereby confesses and judicially admits that on **June 13, 2021**, he did knowingly **conspire to transport an undocumented alien within the United States**, in violation of Title 8, United States Code, Sections 1324 (a)(1)(A)(ii) and (v)(I).

Ralph Gregory Saint-Joie

RALPH GREGORY SAINT-JOIE
AKA: RALPH GREGORY SAINT JOIE
Defendant

w/ P
by Defendant

APPROVED:

JENNIFER B. LOWERY
ACTING UNITED STATES ATTORNEY

By:



Brian Bajew
Assistant United States Attorney



Eduardo Romero
Attorney for Defendant